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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CELERINA NAVARRO, JANET STEVENS,
ARMANDO COVARRUBIAS, EVELYN
ESTRADA, GABRIEL RANGEL JAIME,
ALMA ALDACO, and all others similarly
situated,

Plaintiffs,

v.

THE CITY OF MOUNTAIN VIEW,

Defendant.

Case No. 5:21-cv-05381-NC

**DECLARATION OF QUYEN L. TA IN
SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR
ATTORNEYS' FEES AND COSTS**

Date: February 15, 2022
Time: 1:00 p.m.
Place: Courtroom 5, 4th Floor,
San Jose Courthouse
Judge: Hon. Nathanael Cousins

1 I, Quyen L. Ta, being of age and sound mind hereby declare:

2 1. I am a partner with the law firm King & Spalding LLP, a member in good
3 standing of the State Bar of California, and admitted to practice in the Northern District. I am
4 counsel of record for Plaintiffs in this action. I submit this declaration in support of Plaintiffs'
5 Motion for Attorneys' Fees and Costs. The statements made in this declaration are made of my
6 own personal knowledge. If called as a witness, I could and would testify competently to the
7 facts set forth in this declaration

8 2. As the Court is aware, the parties reached agreement on a payment by Defendant
9 to Plaintiffs of \$ 750,000.00 (the "Agreed Fee Amount") in settlement of Plaintiffs' claims for an
10 award of attorneys' fees and costs, subject to the approval of this Court. At the insistence of
11 Plaintiffs' counsel, this amount was negotiated only after the conclusion of negotiations on all
12 substantive matters affecting the rights of the Plaintiff Class. The parties were significantly
13 assisted in their negotiations by United States Magistrate Susan van Keulen, who had earlier
14 facilitated successful negotiations that lead to the settlement of Plaintiffs' substantive claims.

15 3. The Agreed Fee Amount represents a significant reduction from the total amount
16 of fees incurred by Plaintiffs' counsel in this case, as measured by the number of hours incurred
17 by each timekeeper, multiplied by the hourly billing rate of that timekeeper. That total amount
18 was presented to Defendant's counsel, together with supporting time records, during the course
19 of the parties' negotiations. Even that amount, however, excluded any time incurred after
20 September 14, 2022, which has been substantial. In addition, the time records compiled by King
21 & Spalding excluded the time of several timekeepers who had worked on the case, and
22 eliminated other significant time entries; and I am informed and believe that my co-counsel made
23 similar exclusions and eliminations from their respective time records. In sum, the Agreed Fee
24 Amount represents a negative multiplier from the total fees incurred by Plaintiffs' counsel in this
25 action.

26 4. Having been involved in this case since late 2020, I believe that the Agreed Fee
27 Amount is more than reasonable. The remaining paragraphs of this declaration describe the
28 basis for Plaintiffs' attorneys' fee request, to the extent based on the work of King & Spalding in

1 this case. In the paragraphs that follow, I describe the relevant background and experience of
 2 King & Spalding's team and the role we have played in this case that justifies Plaintiffs' request
 3 for fees and costs.

4 **EXPERIENCE AND QUALIFICATIONS KING & SPALDING'S ATTORNEYS**

5 5. The fees Plaintiffs seek for work King & Spalding did was performed by the
 6 following attorneys: Quyen L. Ta, Arwen R. Johnson, Kelly Perigoe, Sam Diamant, Meghan
 7 Strong, and Rachel Rubens. Below I summarize each attorney's background and experience.

8 6. **Quyen L. Ta:** I am a partner at King & Spalding. I graduated from University of
 9 California, Berkeley, School of Law in 2003 and have been barred in California since January
 10 2004. After law school, I spent a year as Policy Counsel and a Public Interest Fellow for the
 11 National Partnership for Women & Families. I then clerked for the Honorable Lawrence K.
 12 Karlton on the United States District Court for the Eastern District of California. In 2006, I
 13 joined Keker, Van Nest & Peters LLP and was made a partner there in 2011. In 2018, I joined
 14 Boies Schiller Flexner LLP ("Boies Schiller") as the Office Managing partner, and then in May
 15 2020 I joined King & Spalding. I specialize in in consumer class action defense, intellectual
 16 property, international arbitrations, trade secrets misappropriation, and other business disputes. I
 17 serve as lead counsel on class action matters for venture-backed and publicly-traded companies,
 18 including Walmart, Netgear, Public Storage, Flowers Foods, ExtraSpace Storage, Sutter Health,
 19 Molina Healthcare, and United Healthcare. I have also served as lead counsel on numerous pro
 20 bono and civil rights matters, including *Anh Le v. San Francisco District Attorney's Office*, 3:22-
 21 cv-00477 (N.D. Cal) and *City of Santa Ana v. County of Orange*, Case No. 8:20-cv-00069 (C.D.
 22 Cal.). I have been named a Top 100 Lawyer in California, a Top Woman Lawyer, a California
 23 Trailblazer, and a Leading 500 Lawyer in America.

24 7. **Arwen R. Johnson:** Ms. Johnson is a partner at King & Spalding. She graduated
 25 from UCLA School of Law in 2006 and has been barred in California since that same year.
 26 After law school, Ms. Johnson clerked for the Honorable Dean D. Pregerson on the United States
 27 District Court for the Central District of California and the Honorable Harry Pregerson on the
 28 Ninth Circuit Court of Appeals. In 2008, Ms. Johnson joined Caldwell Leslie & Proctor as a

1 civil litigator and was elevated to shareholder in 2014. Ms. Johnson next joined Boies Schiller as
2 a partner in 2017, and then in May 2020 she joined King & Spalding. Ms. Johnson has a broad
3 trial practice covering all aspects of complex civil litigation and class action defense on behalf of
4 public companies, and has also been counsel in numerous pro bono and civil rights cases,
5 including: *City of Santa Ana v. County of Orange*, Case No. 8:20-cv-00069 (C.D. Cal.), a case
6 challenging Orange County's failure to provide housing and services to individuals experiencing
7 homelessness; *Davies v. County of Los Angeles*, Case No. 2:14-cv-00907 (C.D. Cal.), a First
8 Amendment action brought in partnership with the ACLU of Southern California challenging the
9 Los Angeles County Board of Supervisors' decision to restore a cross to the county seal; and
10 numerous other pro bono cases in partnership with Bet Tzedek, the California Women's Law
11 Center, and the Inner City Law Center. Ms. Johnson has been recognized as one of the Top 100
12 California Women Lawyers by the Los Angeles Daily Journal and as a Women of Influence by
13 the Los Angeles Business Journal. Ms. Johnson received the First Amendment Award from the
14 ACLU for her pro bono victory in the landmark *Davies v. County of Los Angeles* First
15 Amendment case.

16 8. **Kelly Perigoe:** Ms. Perigoe is a partner at King & Spalding. She graduated from
17 UCLA School of Law in 2009 and has been barred in California since 2010. After law school,
18 Ms. Perigoe clerked for the Honorable Wallace Tashima on the Ninth Circuit Court of Appeals.
19 In 2010, she joined Caldwell Leslie, and then joined Boies Schiller in 2017 as a partner. Most
20 recently, in May 2020, Ms. Perigoe joined King & Spalding as a partner. Ms. Perigoe is a
21 litigator with a focus on appeals in state and federal courts. Her practice covers a wide variety of
22 substantive areas, including class actions, complex commercial litigation, and intellectual
23 property. Ms. Perigoe has also been counsel in numerous pro bono and civil rights cases,
24 including: *City of Santa Ana v. County of Orange*, Case No. 8:20-cv-00069 (C.D. Cal.), a case
25 challenging Orange County's failure to provide housing and services to individuals experiencing
26 homelessness; *Gamez v. United States, et al.*, Case No. 20-161680 (9th Cir.), a case involving an
27 Eighth Amendment deliberate indifference challenge on behalf of an incarcerated plaintiff;
28 *Eknes-Tucker, et al. v. Alabama*, Case No. 22-11707 (11th Cir.), a case challenging, on Due

1 Process and Equal Protection grounds, Alabama’s SB 184, which criminalizes parents seeking
2 essential medical care for their transgender children; and numerous other pro bono cases,
3 including in partnership with the Inner City Law Center. Ms. Perigoe has been recognized as
4 one of the Best Lawyers Under 40 by the LGBT Bar Association in 2018, a Southern California
5 Top 50 Women Rising Star in 2018 and 2019, and a Super Lawyers Rising Star from 2016 to
6 2019.

7 9. **Sam Diamant:** Mr. Diamant is presently a senior associate at King & Spalding
8 who will be promoted to partner effective January 1, 2023. Mr. Diamant graduated from the
9 University of North Carolina School of Law in 2012 and has been barred in California since
10 January 2013. After law school, Mr. Diamant clerked for the Honorable William J. Lafferty on
11 the United States Bankruptcy Court for the Northern District of California. Mr. Diamant then
12 joined King & Spalding in 2014, where his practice focuses on commercial disputes, including
13 matters involving licensing disputes, false advertising, breach of fiduciary duty, and various
14 other business torts. Mr. Diamant has participated in the Ninth Circuit’s pro bono program in the
15 representation of a client seeking the asylum of the United States from political persecution. Mr.
16 Diamant has been recognized as a Super Lawyers Rising Star in 2021 and 2022.

17 10. **Meghan Strong:** Ms. Strong is an associate at King & Spalding. She graduated
18 from Georgetown University Law Center in 2018 and has been barred in California since that
19 year. After law school, Ms. Strong worked at Boies Schiller as an associate before joining King
20 & Spalding in 2020. In 2021, she clerked for the Honorable Laurel Beeler on the United States
21 District Court for the Northern District of California before returning to King & Spalding in
22 January 2022. Ms. Strong worked on this matter both before and after her clerkship. Ms.
23 Strong’s practice focuses on complex civil litigation, and she has served as counsel in multiple
24 class actions. In addition to this case, Ms. Strong’s pro bono experience includes representing a
25 mother seeking sole custody of her two young children and working on *Anh Le v. San Francisco*
26 *District Attorney’s Office*, 3:22-cv-00477 (N.D. Cal), a case advocating for victims’ rights and
27 against hate crime.

11. **Rachel Rubens:** Ms. Rubens is an associate at King & Spalding. She graduated from the University of California, Davis School of Law in 2020 and has been barred in California since January 2021. After law school, Ms. Rubens joined King & Spalding, where she focuses on complex civil litigation, products liability, and mass torts. Ms. Rubens has worked on this action since shortly after joining King & Spalding. In addition, Ms. Rubens served as counsel in an affirmative asylum case, in which she won asylum for a mother and her two boys earlier this year.

12. Other attorneys and paralegals at King & Spalding also worked on and billed time to this case, but as further discussed below, King & Spalding made efforts to reduce its lodestar, and as a result it is not seeking to recover fees for individuals not listed herein.

THE REASONABLENESS OF KING & SPALDING'S HOURLY RATES

13. King & Spalding seeks a heavily discounted rate for work done on this case, which includes a discount off of King & Spalding's standard market rates for each attorney below. Rates change year-to-year, and King & Spalding seeks each attorney's respective discounted client rate for the year in which the work was performed. Those rates are listed below where applicable:

| Attorney | Position | Graduation Year | 2020 Rate/Hour | 2021 Rate/Hour | 2022 Rate/Hour |
|---------------|------------------|-----------------|----------------|----------------|----------------|
| Quyen Ta | Partner | 2003 | \$990.00 | \$1070.00 | N/A |
| Arwen Johnson | Partner | 2006 | \$930.00 | \$1015.00 | \$1125.00 |
| Kelly Perigoe | Partner | 2009 | \$880.00 | \$960.00 | \$1125.00 |
| Sam Diamant | Senior Associate | 2012 | \$810.00 | \$909.43 | \$1024.61 |
| Meghan Strong | Associate | 2018 | \$565.00 | \$645.00 | \$775.00 |
| Rachel Rubens | Associate | 2020 | N/A | \$550.00 | \$639.70 |

14. I believe that each of the hourly rates is reasonable for the services provided and competitive with the broader market for legal services among firms of this size in California. In setting its hourly rates, King & Spalding has done an analysis of its rates based on benchmarking services from Hildebrandt Peer Monitor and PricewaterhouseCoopers. According to that analysis, the King & Spalding rates in this matter are 5 to 15 percent below the 2021 AmLaw 50, top 75th percentile average standard rates for litigation, depending on the survey.

1 **KING & SPALDING’S BILLING PRACTICES AND WORK PERFORMED**

2 **A. King & Spalding’s Billing Practices**

3 15. I am familiar with my firm’s billing practices and timekeeping practices. King &
4 Spalding uses an electronic time entry and billing software system, in which attorneys and
5 paralegals enter all of their time. For each entry, the timekeeper enters the case matter number,
6 date of time entry, amount of time in tenths of an hour, and a description of the work performed.
7 As a matter of practice, King & Spalding attorneys and paralegals record their time as
8 contemporaneously as possible with the actual expenditure of time. Attorneys are required to
9 enter and finalize all their time on a weekly basis.

10 **B. Work Performed by King & Spalding**

11 16. Co-counsel in this action shared and allocated responsibilities on this case to
12 ensure coordination and efficient case management. Most of our work is described in our
13 contemporaneous billing records, which are attached as **Exhibit A** to this Declaration with
14 redactions to protect privileged and work product material. A summary of the work King &
15 Spalding performed is also below.

16 17. In late 2020, King & Spalding partnered with the ACLU of Northern California,
17 Disability Rights Advocates, and the Law Foundation of Silicon Valley to address the ordinances
18 recently passed by Mountain View. From late 2020 through mid-2021, King & Spalding
19 conducted extensive research and analysis regarding potential claims under the federal and
20 California constitutions, as well as federal and state statutes. We then worked with co-counsel to
21 draft a Complaint setting out Plaintiffs’ claims, which we filed in July 2021.

22 18. King & Spalding has taken the laboring oar on drafting much of the briefing in
23 this case. Our team drafted Plaintiffs’ Motion for Preliminary Injunction in August 2021. We
24 also drafted the Oppositions to Defendant’s Motion to Dismiss and Request for Judicial Notice,
25 which Mr. Diamant of King & Spalding argued on behalf of Plaintiffs.

26 19. King & Spalding has also participated in and supported settlement negotiations
27 throughout 2021 and 2022 including attending several settlement conferences with Magistrate
28 Judge van Keulen during 2022 and reviewing drafts of the settlement agreement.

20. In October and November, King & Spalding drafted Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Mr. Diamant argued the Motion before the Court.¹

21. Finally, King & Spalding provided periodic translation resources throughout the case, for which it seeks reimbursement of costs. This included, for example, translating the settlement agreement and other important documents into Spanish for the Named Plaintiffs. King & Spalding incurred costs of \$6,483.89 in connection with this matter.

C. Lodestar Reductions to Fees

22. In preparation for this Motion for Attorneys' Fees and Costs, the team at King & Spalding reviewed our records for duplication and/or inefficiencies and made discrete deductions from our total hours. For example, we have excluded all paralegal time and all time by an attorney who billed fewer than 50 hours on this case. In addition, for meetings with co-counsel or court appearances where more than one King & Spalding attorney was present, we have only charged for one attorney's time.

23. Together, these exercises in billing judgments reduced our total lodestar by 127 hours and \$101,448.72 which is approximately a 17% reduction in our total billings. These hours are significantly more than what we are requesting this Court approve based on our settlement negotiations with the City.

24. King & Spalding undertook these efforts to reduce its lodestar in order to facilitate a settlement on fees, which was successful, but it does not in fact seek to recover any fees for itself. As a law firm pro bono partner, King & Spalding has donated the time of its attorneys to this case. King & Spalding will not retain any of the award which will be shared by the non-profit organizations who are co-counsel to King & Spalding in this action.

¹ The Preliminary Approval of Class Action Settlement is part of the work King & Spalding performed but is not included in Exhibit A, which shows fees only through mid-September, 2022. King & Spalding is also drafting the Motion for Final Approval of Class Action Settlement, which will be filed on December 22, 2022.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct, and that this declaration is executed at Berkeley, California this
3 13th day of December 2022.

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7 Quyen L. Ta
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EXHIBIT A

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

| | |
|--------------|----------|
| Invoice No. | 10558182 |
| Invoice Date | 09/21/22 |
| Client No. | 99994 |
| Matter No. | 420356 |

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

For Professional Services Rendered through 12/31/20:

| | | |
|---------------------------|-----------|------------------|
| Fees | \$ | 44,495.50 |
| Total this Invoice | \$ | 44,495.50 |

Payment is Due Upon Receipt

99994 Zz994 Pro Bono
 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558182
 Page 2

PROFESSIONAL SERVICES

| Date | Timekeeper | Description | Hours |
|----------|------------|--|-------|
| 12/03/20 | A Johnson | Co-counsel strategy call and analysis | 0.8 |
| 12/08/20 | Q Ta | Attend team meeting and discuss task list | 1.0 |
| 12/10/20 | S Diamant | Confer with Q. Ta and team regarding call scheduling and review of materials | 0.7 |
| 12/11/20 | S Diamant | Confer with Q. Ta and team regarding status and background; videoconference with Q. Ta and team regarding matter background and strategy; draft task list regarding research projects and fact investigation; revise same pursuant to A. Johnson comments; review background materials and case law from Law Foundation OneDrive; save materials to case file; confer with Q. Ta and team regarding background materials and case file | 4.5 |
| 12/11/20 | A Johnson | Analyze case background documents and research; emails and conference with K&S team regarding same and research assignments | 2.0 |
| 12/11/20 | K Perigoe | Attend team strategy meeting; prepare for same | 1.0 |
| 12/11/20 | M Strong | Case team strategy call; review case background materials | 1.7 |
| 12/12/20 | S Diamant | Review background materials and case law from Law Foundation OneDrive in advance of initial call with HP Enterprise team | 4.6 |
| 12/13/20 | S Diamant | Review background materials and case law from Law Foundation OneDrive in advance of initial call with HP Enterprise team | 4.5 |
| 12/14/20 | S Diamant | Pull briefing from [REDACTED] related proceeding and review of same; confer with S. Butler regarding same; confer with Q. Ta and team regarding status and case file | 2.0 |
| 12/14/20 | K Perigoe | Confer with A. Johnson regarding case strategy [REDACTED] | 0.2 |
| 12/15/20 | S Diamant | Confer with K. Perigoe regarding research issues; telephone conference with HP Enterprise and team regarding status and strategy; confer with Q. Ta and team regarding status, strategy, and staffing; draft common interest and confidentiality agreement; confer with Q. Ta and team | 3.0 |

99994 Zz994 Pro Bono
 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558182
 Page 3

| Date | Timekeeper | Description | Hours |
|----------|------------|--|-------|
| | | regarding same | |
| 12/15/20 | A Johnson | Analyze research materials | 0.5 |
| 12/15/20 | K Perigoe | Review case documents | 1.7 |
| 12/15/20 | M Strong | Review Mountain View background materials | 1.0 |
| 12/15/20 | Q Ta | Attend weekly call with non-profits | 0.7 |
| 12/16/20 | S Diamant | Draft common interest and confidentiality agreement; review and analyze case law regarding [REDACTED] | 2.0 |
| 12/17/20 | S Diamant | Draft common interest and confidentiality agreement; review and analyze case law regarding [REDACTED] | 4.0 |
| 12/17/20 | A Johnson | Conference with M. Strong regarding strategy for research issues; emails with team regarding same and liaison issues | 0.5 |
| 12/17/20 | M Strong | Review co-counsel's research memos; call with A. Johnson regarding plan for researching claims | 0.8 |
| 12/18/20 | S Diamant | Confer with A. Johnson and team regarding draft common interest agreement and case status; confer with Law Foundation and ACLU teams regarding call scheduling | 0.8 |
| 12/19/20 | S Diamant | Review and analyze case law regarding [REDACTED] | 2.0 |
| 12/20/20 | S Diamant | Review and analyze case law regarding [REDACTED]; review Law Foundation memorandum summarizing findings regarding same | 3.0 |
| 12/21/20 | S Diamant | Confer with nonprofit team regarding call scheduling; confer with Q. Ta and team regarding status and strategy | 0.8 |
| 12/22/20 | S Diamant | Confer with team regarding status and call scheduling; review memorandum by Law Foundation regarding [REDACTED]; telephone conference with Law Foundation, ACLU and DRA teams regarding analysis of [REDACTED] | 3.2 |
| 12/23/20 | S Diamant | Mountain View - Confer with Q. Ta and team regarding status and strategy; review additional authorities on right to travel doctrine | 1.0 |
| 12/28/20 | S Diamant | Review and analyze case law regarding [REDACTED] | 4.0 |
| 12/29/20 | S Diamant | Review and analyze case law regarding [REDACTED] | 2.8 |

99994 Zz994 Pro Bono
 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558182
 Page 4

| Date | Timekeeper | Description | Hours |
|------|------------|-------------|-------|
| | | | |
| | | | 54.8 |

TIMEKEEPER SUMMARY

| Timekeeper | Hours | Rate | Value |
|---------------|-------|-----------|-------------|
| Arwen Johnson | 3.8 | \$ 930.00 | \$ 3,534.00 |
| Kelly Perigoe | 2.9 | 880.00 | 2,552.00 |
| Quyen Ta | 1.7 | 990.00 | 1,683.00 |
| Sam Diamant | 42.9 | 810.00 | 34,749.00 |
| Meghan Strong | 3.5 | 565.00 | 1,977.50 |
| Total | 54.8 | | \$44,495.5 |

Total This Invoice \$44,495.50

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

| | |
|--------------|----------|
| Invoice No. | 10558182 |
| Invoice Date | 09/21/22 |
| Client No. | 99994 |
| Matter No. | 420356 |

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

REMITTANCE

Please return this page with your remittance.

| | |
|-------------------------|--------------------|
| Amount Due This Invoice | \$44,495.50 |
|-------------------------|--------------------|

Payment is Due Upon Receipt

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

| | |
|--------------|----------|
| Invoice No. | 10558179 |
| Invoice Date | 09/21/22 |
| Client No. | 99994 |
| Matter No. | 420356 |

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

For Professional Services Rendered through 12/31/21:

| | | |
|---------------------------|-----------|-------------------|
| Fees | \$ | 362,914.03 |
| Total this Invoice | \$ | 362,914.03 |

Payment is Due Upon Receipt

99994 Zz994 Pro Bono
 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558179
 Page 2

PROFESSIONAL SERVICES

| Date | Timekeeper | Description | Hours |
|----------|------------|---|-------|
| 01/04/21 | A Johnson | Analyze materials; emails with M. Strong regarding same | 0.3 |
| 01/05/21 | S Diamant | Telephone conference with HP Enterprise and case team; summarize call in writing for K&S team | 1.0 |
| 01/05/21 | Q Ta | Confer with non-profits regarding strategy and legal research | 0.5 |
| 01/06/21 | A Johnson | Confer with M. Strong on [REDACTED] issues; analyze memorandums regarding same | 0.6 |
| 01/06/21 | M Strong | Review co-counsel's research on [REDACTED]; call with A. Johnson to discuss [REDACTED] claims | 0.9 |
| 01/08/21 | S Diamant | Research and analyze case law regarding [REDACTED] | 1.2 |
| 01/10/21 | S Diamant | Review [REDACTED] case law; draft memorandum summarizing findings regarding same | 3.1 |
| 01/11/21 | S Diamant | Review [REDACTED] case law; draft memorandum summarizing findings regarding same; draft and revise comment interest agreement [REDACTED]; circulate draft common interest agreement to nonprofit team and HP Enterprise; telephone conference with Q. Ta and team regarding status and strategy | 7.0 |
| 01/11/21 | A Johnson | Confer with K&S team regarding research projects and strategy for complaint | 0.5 |
| 01/11/21 | M Strong | Research [REDACTED] claims; participate in team meeting; revise memorandum regarding [REDACTED] | 3.1 |
| 01/11/21 | Q Ta | Review memorandum and edit same regarding procedural issues | 0.5 |
| 01/11/21 | Q Ta | Confer with team regarding memos and upcoming discussions for tomorrow | 0.5 |
| 01/11/21 | Q Ta | Review and edit memorandum regarding [REDACTED] issues; confer with [REDACTED] M. Strong regarding same | 0.3 |
| 01/12/21 | S Diamant | Telephone conference with nonprofit team and HP Enterprise regarding status and strategy; confer with K. Perigoe regarding [REDACTED] research and analysis; confer with ACLU | 1.5 |

99994 Zz994 Pro Bono
 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558179
 Page 3

| Date | Timekeeper | Description | Hours |
|----------|------------|---|-------|
| | | regarding draft common interest agreement | |
| 01/12/21 | K Perigoe | Analyze [REDACTED] research | 1.0 |
| 01/12/21 | M Strong | Review team memos; research [REDACTED] claims; participate in weekly strategy call with co-counsel | 5.2 |
| 01/12/21 | Q Ta | Review [REDACTED] research from team; participate in group weekly call | 0.7 |
| 01/13/21 | S Diamant | Confer with nonprofits and HP Enterprise team regarding common interest agreement | 0.3 |
| 01/13/21 | M Strong | Update [REDACTED] memorandum and circulate to team | 0.2 |
| 01/14/21 | S Diamant | Draft and revise memorandum on [REDACTED] pursuant to K. Perigoe comments | 0.8 |
| 01/14/21 | M Strong | Call with Q. Ta to discuss [REDACTED] and related research | 1.0 |
| 01/15/21 | K Perigoe | Analyze [REDACTED] research | 2.5 |
| 01/19/21 | S Diamant | Telephone conference with team regarding strategy; confer with team regarding common interest agreement | 0.7 |
| 01/19/21 | Q Ta | Attend weekly pro bono team meeting | 0.5 |
| 01/25/21 | A Johnson | Confer with M. Strong regarding [REDACTED] research | 0.2 |
| 01/25/21 | K Perigoe | Analyze [REDACTED] issues | 2.1 |
| 01/26/21 | A Johnson | Confer with M. Strong regarding [REDACTED] research | 0.3 |
| 01/26/21 | M Strong | Draft memorandum analyzing [REDACTED] and related research | 4.8 |
| 01/27/21 | M Strong | Work on memorandum regarding [REDACTED] | 1.5 |
| 01/28/21 | M Strong | Work on memos regarding [REDACTED] [REDACTED] | 4.1 |
| 01/29/21 | A Johnson | Edit [REDACTED] memorandum and emails with M. Strong regarding same | 1.0 |

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| Date | Timekeeper | Description | Hours |
|----------|------------|---|-------|
| 01/29/21 | M Strong | Incorporate A. Johnson's edits and revise [REDACTED] memorandum | 2.0 |
| 01/30/21 | S Diamant | Research and analyze [REDACTED] issues in preparation for memorandum regarding same | 2.0 |
| 01/31/21 | M Strong | Work on [REDACTED] memorandum | 1.0 |
| 02/01/21 | S Diamant | Review [REDACTED]; telephone conference with Q. Ta and team regarding status and strategy | 2.6 |
| 02/01/21 | A Johnson | Confer with team regarding case strategy and constitutional research | 0.5 |
| 02/01/21 | K Perigoe | Revise [REDACTED] memorandum; attend team meeting regarding status and strategy | 4.2 |
| 02/01/21 | Q Ta | Review [REDACTED] memorandum | 0.5 |
| 02/02/21 | A Johnson | Confer with M. Strong regarding [REDACTED] issues; confer with co-counsel and common interest counsel regarding research and case strategy | 0.8 |
| 02/02/21 | M Strong | Finalize and circulate memos to HPE and broader team; review memos in preparation for call; discuss claims during weekly group call | 1.5 |
| 02/02/21 | Q Ta | Call with team regarding legal research | 0.3 |
| 02/04/21 | S Diamant | Research and draft memorandum on [REDACTED] | 5.5 |
| 02/05/21 | S Diamant | Research and draft memorandum on [REDACTED] claims; confer with K. Perigoe regarding same | 2.2 |
| 02/05/21 | K Perigoe | Revise memorandum regarding [REDACTED] | 1.0 |
| 02/07/21 | S Diamant | Draft and revise [REDACTED] pursuant to K. Perigoe comments; confer with K. Perigoe regarding same | 2.2 |
| 02/07/21 | K Perigoe | Revise memorandum regarding [REDACTED] | 0.4 |
| 02/08/21 | S Diamant | Draft and revise memorandum on [REDACTED] claims; circulate memorandum on [REDACTED] claims to HPE and nonprofit teams; draft chart summarizing claims [REDACTED] | 1.4 |
| 02/08/21 | A Johnson | Emails with team regarding strategy and research status; prepare for common interest call | 0.3 |
| 02/08/21 | M Strong | Review S. Diamant's memorandum regarding [REDACTED]; draft chart of possible claims | 0.8 |
| 02/09/21 | S Diamant | Draft chart summarizing claims [REDACTED]; confer with | 1.9 |

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| Date | Timekeeper | Description | Hours |
|-------------|-------------------|--|--------------|
| | | M. Strong [REDACTED] regarding same; confer with A. Johnson and team regarding call agenda; telephone conference with HPE and nonprofit team regarding status and strategy | |
| 02/09/21 | K Perigoe | Review memorandum regarding constitutional issues | 0.4 |
| 02/09/21 | M Strong | Finalize and circulate overview of claims chart; correspondence with team | 0.6 |
| 02/10/21 | M Strong | Work on overview of claims chart | 0.3 |
| 02/16/21 | S Diamant | Telephone conference with HPE and nonprofit team regarding status and strategy; confer with ACLU counsel regarding logistics | 0.4 |
| 02/16/21 | A Johnson | Confer with common interest counsel regarding strategy; emails regarding same | 0.5 |
| 02/16/21 | K Perigoe | Attend common interest meeting; internal emails and conferences regarding same | 0.5 |
| 02/16/21 | M Strong | Participate in weekly team call; summarize and circulate call notes to the group | 0.6 |
| 02/23/21 | S Diamant | Confer with A. Johnson and team regarding status and strategy | 0.4 |
| 02/23/21 | A Johnson | Teleconference with Law Foundation regarding strategy; emails with team regarding same | 1.0 |
| 02/23/21 | Q Ta | Confer with Law Foundation lawyers; attend team meeting | 1.0 |
| 03/01/21 | S Diamant | Confer with M. Strong and team regarding scheduling and tasks; | 1.0 |

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| Date | Timekeeper | Description | Hours |
|-------------|-------------------|--|--------------|
| | | telephone conference with Q. Ta and team regarding status and strategy | |
| 03/02/21 | A Johnson | Confer with team regarding strategy | 0.3 |
| 03/02/21 | Q Ta | Confer with HPE team regarding strategy decisions | 0.5 |
| 03/02/21 | Q Ta | Attend and participate in weekly meeting | 0.5 |
| 03/02/21 | Q Ta | Review and edit complaint; confer with team regarding same | 2.0 |
| 03/09/21 | S Diamant | Telephone conference with joint defense group regarding status and strategy; confer with Q. Ta and team regarding strategy and tasks | 1.3 |
| 03/15/21 | Q Ta | Confer with team regarding tasks | 0.5 |
| 03/16/21 | S Diamant | Confer with Q. Ta and team regarding status and strategy | 1.1 |
| 03/16/21 | M Strong | Work on chart of [REDACTED] and related correspondence; participate in weekly team meeting | 2.3 |
| 03/16/21 | Q Ta | Confer with team regarding next steps and interviewing plaintiffs | 0.5 |
| 03/22/21 | S Diamant | Telephone conference with R. Rubens regarding case background and strategy; review materials in preparation for same | 0.9 |
| 03/22/21 | R Rubens | Onboarding call with S. Diamant | 0.5 |

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| Date | Timekeeper | Description | Hours |
|----------|------------|--|-------|
| 03/23/21 | Q Ta | Call with ACLU and team regarding case issues | 0.5 |
| 03/28/21 | R Rubens | Research [REDACTED] and draft memorandum | 3.8 |
| 03/29/21 | S Diamant | Confer with R. Rubens regarding research on [REDACTED] issues and related strategy | 0.6 |
| 03/29/21 | A Johnson | Prepare for plaintiff interview; emails regarding same | 0.2 |
| 03/29/21 | R Rubens | Research [REDACTED] and work on memorandum | 2.7 |
| 03/30/21 | S Diamant | Telephone conference with HP Enterprise, ACLU and common interest group regarding status and strategy | 0.5 |
| 03/30/21 | A Johnson | Analyze preliminary injunction motions; confer with common interest team on case strategy | 0.6 |
| 03/30/21 | R Rubens | Research and analyze [REDACTED] | 2.5 |
| 03/31/21 | R Rubens | Write draft memorandum on [REDACTED] | 2.5 |
| 04/01/21 | R Rubens | Draft memorandum [REDACTED] | 1.2 |
| 04/02/21 | R Rubens | Finalize memorandum on [REDACTED] | 2.2 |
| 04/05/21 | S Diamant | Review and comment on research memorandum by R. Rubens | 0.5 |
| 04/13/21 | Q Ta | Confer with ACLU, DRA, and Law Foundation regarding lawsuit | 0.8 |
| 04/16/21 | S Diamant | Telephone conference with Law Foundation regarding Mountain View complaint and preliminary injunction strategy; confer with Q. Ta and A. Johnson regarding status and strategy | 1.0 |

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| Date | Timekeeper | Description | Hours |
|----------|------------|--|-------|
| 04/20/21 | Q Ta | Attend and participate in weekly call | 0.5 |
| 04/21/21 | A Johnson | Analyze memorandum regarding [REDACTED]; emails with team regarding same | 0.3 |
| 04/29/21 | A Johnson | Analyze draft complaint; emails with team regarding same and next steps; analyze [REDACTED] | 0.5 |
| 05/01/21 | R Rubens | Review draft complaint and provide feedback | 1.4 |
| 05/02/21 | S Diamant | Review and comment on draft complaint | 2.0 |
| 05/03/21 | A Johnson | Emails regarding strategy for draft complaint; analyze same | 0.5 |
| 05/04/21 | S Diamant | Conference with HPE and K&S teams regarding draft complaint; confer with R. Rubens regarding [REDACTED]; conference with common interest group regarding status and strategy | 1.8 |
| 05/04/21 | A Johnson | Telephone conference regarding strategy for draft complaint; revise same; emails regarding same | 1.5 |
| 05/05/21 | R Rubens | Revise and edit first draft of complaint | 2.6 |
| 05/06/21 | S Diamant | Draft and revise complaint | 6.5 |
| 05/06/21 | A Johnson | Revise draft complaint; emails with team regarding same | 1.0 |
| 05/07/21 | A Johnson | Revise draft complaint; emails with team regarding same | 0.2 |
| 05/08/21 | A Johnson | Edit draft complaint | 1.0 |
| 05/10/21 | S Diamant | Finalize revised draft complaint; confer with A. Johnson and team regarding same | 1.5 |
| 05/11/21 | S Diamant | Confer with HP Enterprise team regarding comments on draft complaint; confer with Law Foundation team regarding call scheduling | 0.5 |
| 05/13/21 | S Diamant | Conference with Law Foundation team regarding draft complaint and related strategy; summarize in writing for A. Johnson and team | 0.5 |
| 05/13/21 | R Rubens | Call with Law Foundation regarding edits to complaint | 0.3 |
| 05/16/21 | R Rubens | Review PRA responses from City | 1.0 |
| 05/18/21 | S Diamant | Confer with common interest and case teams regarding status and strategy | 1.0 |
| 05/18/21 | A Johnson | Emails with S. Diamant and R. Reubens regarding strategy, demand letter, and PRA responses | 0.5 |
| 05/20/21 | R Rubens | Draft demand letter | 1.0 |
| 05/21/21 | R Rubens | Finalize demand letter | 1.8 |
| 05/24/21 | S Diamant | Draft and revise demand letter to City of Mountain View; confer with A. Johnson and team regarding same | 2.5 |

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| Date | Timekeeper | Description | Hours |
|----------|------------|---|-------|
| 05/25/21 | S Diamant | Draft demand letter to City of Mountain View; telephone conference with common interest team regarding status and strategy | 0.9 |
| 05/25/21 | A Johnson | Emails with S. Diamant and R. Ruben regarding revised correspondence and strategy for same | 0.3 |
| 05/25/21 | Q Ta | Attend weekly team meeting; review task list and demand letter for same | 0.7 |
| 05/26/21 | S Diamant | Draft and revise demand letter; confer with A. Johnson and team regarding same | 1.4 |
| 05/26/21 | A Johnson | Further revise draft demand letter | 0.2 |
| 05/27/21 | A Johnson | Observe hearing and emails regarding same | 0.4 |
| 06/01/21 | A Johnson | Common interest teleconference regarding strategy; emails with team regarding same | 0.6 |
| 06/02/21 | A Johnson | Emails regarding strategy for demand letter; revise same | 0.2 |
| 06/04/21 | S Diamant | Draft, revise and finalize demand letter to City of Mountain View; confer with R. Rubens and common interest group regarding same | 1.2 |
| 06/04/21 | R Rubens | Finalize demand letter | 0.6 |
| 06/08/21 | S Diamant | Summarize standing call in writing for Q. Ta and team | 0.4 |
| 06/08/21 | Q Ta | Attend weekly meeting | 0.6 |
| 06/15/21 | A Johnson | Telephone conference with common interest counsel regarding complaint strategy | 0.5 |
| 06/16/21 | S Diamant | Confer with translation service and co-counsel regarding translation of complaint | 0.5 |
| 06/16/21 | R Rubens | Revise new draft of complaint | 0.8 |
| 06/17/21 | S Diamant | Review and comment on draft complaint; confer with team regarding same | 1.2 |

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| Date | Timekeeper | Description | Hours |
|-------------|-------------------|---|--------------|
| 06/17/21 | A Johnson | Revise draft complaint | 0.3 |
| 06/18/21 | A Johnson | Revise draft complaint; emails regarding same; analyze response from City of Mountainview | 1.0 |
| 06/21/21 | S Diamant | Confer with common interest group regarding draft complaint | 0.5 |
| 06/22/21 | S Diamant | Review City's response to demand letter; telephone conference with common interest group regarding status and strategy; confer with Q. Ta and A. Johnson regarding attendance at post-filing press conference | 1.2 |
| 06/22/21 | A Johnson | Emails with S. Diamant and Q. Ta regarding strategy for complaint | 0.2 |
| 06/22/21 | Q Ta | Confer with team regarding complaint and demand letter | 0.5 |
| 06/23/21 | A Johnson | Emails with joint team regarding strategy for revised complaint | 0.2 |
| 06/25/21 | S Diamant | Telephone conference with R. Rubens and A. Hines regarding status and strategy | 1.0 |
| 06/25/21 | A Johnson | Emails with team regarding strategy for complaint | 0.2 |
| 06/28/21 | S Diamant | Telephone conference with Law Foundation and team regarding complaint timing; confer with Q. Ta and team regarding same | 1.0 |
| 07/06/21 | S Diamant | Telephone conference with common interest group regarding status and strategy; summarize status in writing for D. Kwong | 0.6 |
| 07/06/21 | Q Ta | Attention to call with non-profits and planning for filing | 0.5 |
| 07/07/21 | S Diamant | Confer with team regarding [REDACTED] | 0.5 |
| 07/07/21 | A Johnson | Emails with team regarding [REDACTED] | 0.3 |
| 07/08/21 | S Diamant | Review and provide final comments on draft complaint; confer with Q. Ta and team regarding status and strategy | 2.5 |
| 07/13/21 | S Diamant | Confer with Law Foundation regarding filing plan; conference with common interest group regarding status and strategy; | 2.9 |

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| Date | Timekeeper | Description | Hours |
|----------|------------|---|-------|
| | | review, draft and finalize complaint against City of Mountain View; confer with S. Butler and R. Pada regarding same | |
| 07/13/21 | Q Ta | Attention to client call and confer with S. Diamant regarding same | 1.5 |
| 07/14/21 | A Johnson | Emails with team regarding filing complaint and strategy for same; revise same | 1.0 |
| 07/21/21 | S Diamant | Confer with R. Rubens regarding research assignments | 0.3 |
| 07/22/21 | R Rubens | Review [REDACTED] | 1.4 |
| 07/23/21 | S Diamant | Confer with Q. Ta regarding preliminary injunction planning and strategy; telephone conference with Law Foundation team regarding same; review preliminary injunction briefing from Pacifica action | 1.5 |
| 07/23/21 | S Diamant | Review and comment on [REDACTED] | 1.2 |
| 07/23/21 | Q Ta | Call with team to discuss preliminary injunction motion | 0.7 |
| 07/24/21 | R Rubens | Review [REDACTED] | 3.4 |
| 07/26/21 | R Rubens | Finalize and send to team members [REDACTED] research | 0.2 |
| 07/27/21 | S Diamant | Confer with Q. Ta and team regarding status and strategy | 0.8 |
| | | | 1.0 |
| 07/27/21 | Q Ta | Attend weekly call | 0.5 |

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| Date | Timekeeper | Description | Hours |
|----------|------------|---|-------|
| 07/28/21 | R Rubens | Strategy call with A. Johnson and S. Diamant | 0.6 |
| 07/29/21 | R Rubens | Review witness declarations [REDACTED] | 0.5 |
| 07/30/21 | A Johnson | Analyze comments [REDACTED]; emails with team regarding strategy for same | 0.3 |
| 07/30/21 | R Rubens | Review witness declarations [REDACTED] | 1.8 |
| 08/01/21 | S Diamant | Research and draft preliminary injunction motion against the City of Mountain View | 1.0 |
| 08/02/21 | S Diamant | Draft and finalize stipulation with City of Mountain View on time to respond to complaint and briefing deadlines; confer with Plaintiffs' co-counsel regarding same | 0.7 |
| 08/03/21 | S Diamant | Research and draft preliminary injunction motion against the City of Mountain View | 6.1 |
| 08/03/21 | A Johnson | Confer with team regarding strategy for preliminary injunction | 0.2 |
| 08/03/21 | R Rubens | Review case updates and begin drafting [REDACTED] portion of preliminary injunction motion | 0.8 |
| 08/04/21 | S Diamant | Research and draft preliminary injunction motion against the City of Mountain View | 2.8 |
| 08/04/21 | S Diamant | Research and draft preliminary injunction motion against the City of Mountain View | 2.8 |
| 08/05/21 | S Diamant | Research and draft preliminary injunction motion against the City of Mountain View | 7.2 |
| 08/05/21 | R Rubens | Research and draft insert on [REDACTED] for preliminary injunction motion | 4.3 |
| 08/06/21 | S Diamant | Confer with team regarding [REDACTED] strategy; review comments and changes from Q. Ta and team on draft preliminary injunction motion | 1.4 |
| 08/06/21 | A Johnson | Revise preliminary injunction motion and emails regarding same | 1.5 |
| 08/06/21 | K Perigoe | Revise preliminary injunction motion | 2.5 |
| 08/07/21 | Q Ta | Review and edit preliminary injunction motion and confer with team regarding same | 1.5 |
| 08/09/21 | S Diamant | Draft and revise preliminary injunction motion pursuant to comments by Q. Ta and team; research issues flagged by comments from K. Perigoe and team | 4.1 |
| 08/09/21 | R Rubens | Research case law on [REDACTED] | 1.5 |
| 08/10/21 | S Diamant | Finalize and circulate draft preliminary injunction motion | 1.3 |
| 08/10/21 | A Johnson | Revise preliminary injunction motion; confer with S. Diamant regarding same | 0.4 |
| 08/11/21 | S Diamant | Draft agenda for strategy call; confer with A. Johnson and team | 1.5 |

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| Date | Timekeeper | Description | Hours |
|----------|------------|---|-------|
| | | regarding same; review [REDACTED] comments on draft preliminary injunction motion | |
| 08/11/21 | A Johnson | Emails with S. Diamant regarding strategy for preliminary injunction motion | 0.2 |
| 08/11/21 | R Rubens | Review latest draft of preliminary injunction motion | 0.7 |
| 08/12/21 | S Diamant | Conference with ACLU and non-profit team regarding strategy on preliminary injunction motion; confer with Q. Ta and team regarding same; draft case management conference statement | 2.2 |
| 08/12/21 | A Johnson | Revise papers and emails with S. Diamant regarding strategy | 0.5 |
| 08/12/21 | R Rubens | Call and strategize with nonprofit groups regarding upcoming preliminary injunction motion | 1.5 |
| 08/14/21 | S Diamant | Draft case management conference statement; review standing order regarding same | 3.0 |
| 08/15/21 | S Diamant | Draft and revise case management conference statement pursuant to A. Johnson comments | 1.1 |
| 08/15/21 | A Johnson | Edit CMC Statement | 0.5 |
| 08/16/21 | S Diamant | Draft and circulate CMC statement to co-counsel | 0.3 |
| 08/17/21 | S Diamant | Conference with co-counsel regarding status and strategy; revise and finalize draft CMC statement | 1.3 |
| 08/17/21 | A Johnson | Edits to drafts; confer with team regarding strategy following meet and confer | 0.3 |
| 08/17/21 | Q Ta | Attend weekly call and attention to motion to dismiss | 2.0 |
| 08/19/21 | S Diamant | Conference with City regarding 26(f) and initial case management conference; draft and revise preliminary injunction motion; confer with team regarding same | 1.3 |
| 08/19/21 | A Johnson | Edit preliminary injunction brief materials and emails with S. Diamant and team regarding strategy for same | 1.3 |
| 08/20/21 | S Diamant | Confer with team regarding status, strategy and case deadlines | 0.8 |
| 08/24/21 | S Diamant | Draft, revise and finalize case management conference statement; prepare for filing; confer with team regarding same | 3.0 |
| 08/24/21 | K Perigoe | Confer with team regarding case strategy | 0.5 |
| 08/25/21 | S Diamant | Draft and revise preliminary injunction pursuant to comments from co-counsel | 2.4 |
| 08/25/21 | A Johnson | Telephone conferences regarding strategy; analyze motion to dismiss; telephone conference with R. Reubens regarding opposition to motion to dismiss | 1.3 |
| 08/25/21 | K Perigoe | Confer with co-counsel regarding discovery and motion practice strategy | 0.2 |

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| Date | Timekeeper | Description | Hours |
|----------|------------|--|-------|
| 08/25/21 | R Rubens | Discuss upcoming tasks with A. Johnson | 0.5 |
| 08/26/21 | S Diamant | Draft proposed order granting preliminary injunction; draft and revise preliminary injunction brief | 1.3 |
| 08/26/21 | R Rubens | Draft initial disclosures | 3.6 |
| 08/28/21 | S Diamant | Draft preliminary injunction motion and proposed order | 0.5 |
| 08/29/21 | S Diamant | Draft and finalize preliminary injunction motion | 2.0 |
| 08/29/21 | A Johnson | Edits to initial disclosures; emails with R. Reubens regarding same | 0.5 |
| 08/30/21 | S Diamant | Finalize preliminary injunction motion with tables and exhibits for filing; confer with paralegal team regarding same | 3.1 |
| 08/30/21 | A Johnson | Emails regarding strategy for opposition to motion to dismiss and CMC preparation; telephone conference with R. Reubens and K. Perigoe regarding same | 0.4 |
| 08/30/21 | K Perigoe | Confer with R. Rubens regarding opposition to motion to dismiss | 1.0 |
| 08/30/21 | R Rubens | Review motion to dismiss in preparation for drafting opposition; confer with K. Perigoe and A. Johnson regarding same; incorporate comments from A. Johnson into initial disclosures | 1.6 |
| 08/30/21 | Q Ta | Attend call regarding CMC | 0.7 |
| 08/31/21 | S Diamant | Attend case management conference; summarize for team | 1.0 |
| 08/31/21 | A Johnson | Emails regarding strategy for opposition to motion to dismiss and CMC outcome | 0.5 |
| 08/31/21 | R Rubens | Attend CMC and post-CMC team debrief | 0.8 |
| 09/01/21 | K Perigoe | Confer with team regarding motion to dismiss Opposition | 0.8 |
| 09/01/21 | R Rubens | Discuss strategy for motion to dismiss briefing with S. Diamant, K. Perigoe and A. Johnson | 1.0 |
| 09/02/21 | S Diamant | Draft stipulation regarding class certification issues with City; confer with co-counsel regarding same | 1.0 |
| 09/02/21 | R Rubens | Review and provide feedback on provisional class certification motion | 0.4 |
| 09/03/21 | R Rubens | Send stipulation for provisional class certification to City counsel | 0.2 |
| 09/06/21 | R Rubens | Draft outline for opposition to City's motion to dismiss complaint | 2.6 |
| 09/07/21 | A Johnson | Confer with team regarding strategy for opposition to motion to dismiss | 0.2 |
| 09/07/21 | K Perigoe | Revise opposition to motion to dismiss | 0.2 |
| 09/07/21 | R Rubens | Draft outline for opposition to motion to dismiss | 2.2 |
| 09/07/21 | R Rubens | Continue outlining opposition to motion to dismiss | 2.4 |
| 09/08/21 | S Diamant | Review and comment on R. Rubens outline for opposition to motion to dismiss | 1.5 |
| 09/08/21 | A Johnson | Emails regarding strategy for opposition to motion to dismiss and outline regarding same | 0.5 |

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| Date | Timekeeper | Description | Hours |
|-------------|-------------------|--|--------------|
| 09/09/21 | R Rubens | Call with S. Diamant regarding motion to dismiss opposition; draft motion to dismiss opposition | 2.7 |
| 09/10/21 | R Rubens | Draft opposition to motion to dismiss | 6.6 |
| 09/12/21 | S Diamant | Draft and revise opposition to motion to dismiss | 2.0 |
| 09/12/21 | K Perigoe | Revise opposition to motion to dismiss | 1.3 |
| 09/13/21 | A Johnson | Revise brief; emails with team regarding strategy for same | 0.8 |
| 09/13/21 | R Rubens | Incorporate comments into motion to dismiss opposition and revise draft | 5.0 |
| 09/14/21 | S Diamant | Draft opposition brief on motion to dismiss; confer with City regarding form of protective order | 4.0 |
| 09/14/21 | A Johnson | Edit briefs and supporting documents | 2.3 |
| 09/14/21 | K Perigoe | Revise opposition to motion to dismiss | 4.0 |
| 09/14/21 | R Rubens | Weekly call with nonprofit groups | 0.5 |
| 09/15/21 | S Diamant | Draft opposition to motion to dismiss | 1.0 |
| 09/15/21 | A Johnson | Analyze RJN and conferences with team regarding strategy for same; revise same | 0.9 |
| 09/15/21 | K Perigoe | Draft opposition to RJN | 3.6 |
| 09/15/21 | R Rubens | Revise opposition to motion to dismiss | 5.0 |
| 09/16/21 | S Diamant | Draft opposition to City's request for judicial notice | 1.5 |
| 09/16/21 | K Perigoe | Revise opposition to RJN | 4.2 |
| 09/16/21 | R Rubens | Compile and send discovery to common interest group for review | 0.1 |
| 09/17/21 | S Diamant | Draft and revise briefs on opposition to motion to dismiss and request for judicial notice | 1.8 |
| 09/17/21 | A Johnson | Revise opposition to request for judicial notice; emails with team regarding plan and strategy | 1.5 |
| 09/17/21 | R Rubens | Edit motion to dismiss and request for judicial notice oppositions | 1.7 |
| 09/18/21 | S Diamant | Draft opposition to motion to dismiss pursuant to comments from group | 1.4 |
| 09/18/21 | R Rubens | Motion to dismiss opposition follow-up research and edits | 1.5 |
| 09/18/21 | Q Ta | Edit motion to dismiss and provide comments to same; confer with team | 1.5 |
| 09/19/21 | S Diamant | Draft, revise and finalize oppositions to motion to dismiss and request for judicial notice | 2.5 |
| 09/19/21 | A Johnson | Revise opposition to motion to dismiss and emails with team regarding same | 0.7 |
| 09/19/21 | R Rubens | Cite check and finalize opposition to motion to dismiss | 2.4 |
| 09/20/21 | S Diamant | Draft, revise and prepare opposition brief to motion to dismiss for filing | 4.0 |
| 09/20/21 | A Johnson | Revise opposition to motion to dismiss and request for judicial notice and emails regarding same | 0.9 |

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|----------|------------|--|-------|
| 09/20/21 | K Perigoe | Revise opposition to RJN | 0.6 |
| 09/20/21 | R Rubens | Edit and finalize request for judicial notice | 0.9 |
| 09/21/21 | S Diamant | Conference with co-counsel; summarize in writing for team | 0.9 |
| 09/21/21 | A Johnson | Analyze final submissions; analyze opposition to preliminary injunction motion; emails with team regarding reply papers | 0.4 |
| 09/21/21 | Q Ta | Confer with team regarding strategy | 0.5 |
| 09/22/21 | S Diamant | Conference with City counsel regarding meet and confer; confer with team regarding same | 0.9 |
| 09/22/21 | R Rubens | Attend meet and confer with city regarding protective order | 0.3 |
| 09/23/21 | S Diamant | Draft protective order; review City's opposition to preliminary injunction motion | 2.3 |
| 09/23/21 | A Johnson | Emails with team regarding strategy for stipulated protective order | 0.2 |
| 09/24/21 | S Diamant | Draft reply brief in support of motion for preliminary injunction | 5.5 |
| 09/24/21 | A Johnson | Telephone conference regarding reply brief strategy; analyze opposition to preliminary injunction motion | 0.8 |
| 09/24/21 | K Perigoe | Confer with team regarding reply strategy | 0.9 |
| 09/24/21 | R Rubens | Strategy call regarding reply brief | 0.8 |
| 09/24/21 | Q Ta | Confer with team regarding reply brief | 1.0 |
| 09/25/21 | S Diamant | Draft reply brief in support of motion for preliminary injunction | 2.5 |
| 09/26/21 | S Diamant | Draft reply brief in support of motion for preliminary injunction | 6.0 |
| 09/27/21 | S Diamant | Draft and revise reply brief on preliminary injunction motion pursuant to A. Johnson and K. Perigoe comments | 3.0 |
| 09/27/21 | A Johnson | Edit draft preliminary injunction reply; emails with team regarding same | 2.0 |
| 09/27/21 | K Perigoe | Revise reply in support of preliminary injunction motion | 2.1 |
| 09/28/21 | S Diamant | Draft and revise reply brief on preliminary injunction motion; confer with group regarding same; conference with co-counsel regarding status and strategy | 3.5 |
| 09/28/21 | A Johnson | Emails with team regarding strategy for preliminary injunction reply | 0.3 |
| 09/28/21 | K Perigoe | Confer with team regarding reply strategy | 0.7 |
| 09/28/21 | R Rubens | Weekly call with nonprofit groups and summarize notes for internal team | 1.0 |
| 10/01/21 | S Diamant | Draft and revise reply brief pursuant to comments from co-counsel; confer with A. Johnson and K. Perigoe regarding same; confer with co-counsel regarding same | 4.5 |
| 10/03/21 | A Johnson | Revise preliminary injunction reply and emails regarding same | 1.0 |
| 10/04/21 | S Diamant | Finalize reply brief in support of preliminary injunction motion and prepare for filing | 3.0 |
| 10/04/21 | A Johnson | Analyze briefing by City; edit reply briefing | 1.0 |

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 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558179
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| Date | Timekeeper | Description | Hours |
|-------------|-------------------|--|--------------|
| 10/05/21 | S Diamant | Confer with A. Johnson and team regarding hearing assignments; conference with co-counsel regarding status and strategy; summarize hearing assignments in writing for team; confer with team regarding same | 2.0 |
| 10/05/21 | A Johnson | Telephone conference regarding strategy for oral argument | 0.5 |
| 10/06/21 | S Diamant | Confer with paralegal team regarding hearing preparation and binders for same | 0.4 |
| 10/13/21 | S Diamant | Analyze case law and materials in advance of hearing | 0.7 |
| 10/14/21 | S Diamant | Prepare for motion to dismiss argument; prepare agenda for moot arguments | 1.5 |
| 10/18/21 | S Diamant | Prepare for moot argument on motion to dismiss opposition; conference with co-counsel regarding moot argument on motion to dismiss opposition and preliminary injunction hearing | 2.0 |
| 10/19/21 | S Diamant | Review case law in preparation for hearing argument on motion to dismiss; outline arguments regarding same; confer with co-counsel regarding outline of arguments and hearing attendance issues | 6.0 |
| 10/20/21 | S Diamant | Prepare for and attending hearing in N.D. Cal. on motion to dismiss and preliminary injunction; confer with co-counsel team regarding same; conference with A. Johnson regarding feedback on hearing argument | 2.5 |
| 10/20/21 | A Johnson | Attend hearing; prepare and post-calls regarding same | 1.5 |
| 10/27/21 | S Diamant | Confer with Law Foundation team regarding status and strategy | 0.7 |
| 11/01/21 | S Diamant | Review draft press release regarding motion to dismiss and preliminary injunction; confer with City's counsel regarding request for discovery deadline extension; confer with A. Johnson and team regarding same | 0.9 |
| 11/01/21 | A Johnson | Emails with S. Diamant regarding discovery and strategy | 0.1 |
| 11/02/21 | S Diamant | Draft agenda for standing call; conference with co-counsel regarding status and strategy; confer with Defendant's counsel regarding stipulation on request for extension of discovery response deadlines | 0.9 |
| 11/02/21 | A Johnson | Telephone conference with team regarding discovery and case | 0.5 |

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 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

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| Date | Timekeeper | Description | Hours |
|-------------|-------------------|---|--------------|
| | | strategy | |
| 11/03/21 | S Diamant | Confer with Defendant's counsel regarding stipulation for extension of discovery response deadlines; review and comment on draft stipulation; confer with co-counsel regarding same | 0.4 |
| 11/04/21 | S Diamant | Review and comment on stipulation from City regarding extension of discovery deadlines; confer with opposing counsel regarding same | 0.5 |
| 11/10/21 | S Diamant | Review and analyze order on motion to dismiss and preliminary injunction | 0.3 |
| 11/11/21 | S Diamant | Confer with co-counsel regarding outreach from City regarding settlement | 0.3 |
| 11/15/21 | S Diamant | Confer with team regarding standing call | 0.2 |
| 11/16/21 | S Diamant | Conference with co-counsel regarding status and strategy | 0.5 |
| 11/17/21 | S Diamant | Conference with City counsel regarding settlement; confer with co-counsel regarding same; summarize in writing for team | 1.4 |
| 11/29/21 | S Diamant | Conference with Magistrate Judge van Keulen regarding settlement conference scheduling; review and comment on draft settlement proposal to City | 1.1 |
| 11/29/21 | R Rubens | Review City's draft of Joint CMC statement | 1.2 |
| 11/30/21 | S Diamant | Review draft letter to City; review and comment on draft case management conference statement; confer with co-counsel regarding status and strategy | 1.3 |
| 11/30/21 | A Johnson | Emails with team and revise settlement letter and CMC statement | 0.4 |
| 11/30/21 | R Rubens | Weekly call, confer with S. Diamant regarding CMC statement and case | 0.8 |
| 12/01/21 | S Diamant | Review and comment on draft case management statement; comment on settlement demand letter | 0.7 |
| 12/09/21 | S Diamant | Conference with City regarding potential settlement discussions; confer with team regarding same | 1.0 |
| 12/14/21 | S Diamant | Draft update to K&S team regarding status of settlement discussions; conference with team regarding status and strategy; confer with organizations regarding settlement status | 2.0 |
| 12/14/21 | A Johnson | Common interest telephone conference with team regarding next steps | 0.5 |
| | | | 0.7 |
| 12/16/21 | S Diamant | Confer with co-counsel regarding status and settlement strategy | 0.4 |

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 420356 Challenge To RV Ban (City Of Mountain Vi
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| Date | Timekeeper | Description | Hours |
|-------------|-------------------|--|--------------|
| 12/17/21 | S Diamant | Conference with co-counsel regarding terms for stay of litigation; conference with City's counsel regarding same; confer with team regarding draft stay terms in writing | 2.0 |
| 12/20/21 | S Diamant | Conference with co-counsel regarding settlement strategy; draft terms for proposed litigation stay | 0.8 |
| 12/22/21 | S Diamant | Conference with co-counsel regarding settlement issues | 0.4 |
| | | | <hr/> 431.3 |

TIMEKEEPER SUMMARY

| Timekeeper | Hours | Rate | Value |
|-------------------|--------------|-------------|--------------------|
| Arwen Johnson | 43.4 | \$ 1015.00 | \$44,051.00 |
| Kelly Perigoe | 34.7 | 960.00 | 33,312.00 |
| Quyen Ta | 22.8 | 1070.00 | 24,396.00 |
| Sam Diamant | 213.1 | 909.43 | 193,799.53 |
| Rachel Rubens | 87.4 | 550.00 | 48,070.00 |
| Meghan Strong | 29.9 | 645.00 | 19,285.50 |
| Total | <hr/> 431.3 | | <hr/> \$362,914.03 |

Total This Invoice

\$362,914.03

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

| | |
|--------------|----------|
| Invoice No. | 10558179 |
| Invoice Date | 09/21/22 |
| Client No. | 99994 |
| Matter No. | 420356 |

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

REMITTANCE

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| Amount Due This Invoice | \$362,914.03 |
|--------------------------------|---------------------|

Payment is Due Upon Receipt

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

| | |
|--------------|----------|
| Invoice No. | 10558181 |
| Invoice Date | 09/21/22 |
| Client No. | 99994 |
| Matter No. | 420356 |

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

For Professional Services Rendered through 09/14/22:

| | | |
|---------------------------|-----------|------------------|
| Fees | \$ | 90,144.62 |
| Total this Invoice | \$ | 90,144.62 |

Payment is Due Upon Receipt

99994 Zz994 Pro Bono
 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558181
 Page 2

PROFESSIONAL SERVICES

| Date | Timekeeper | Description | Hours |
|----------|------------|--|-------|
| 01/13/22 | S Diamant | Confer with co-counsel regarding settlement negotiation issues | 1.0 |
| 01/14/22 | S Diamant | Research California law regarding [REDACTED] [REDACTED] | 1.8 |
| 01/18/22 | S Diamant | Conference with co-counsel regarding status and strategy; review and comment on correspondence regarding [REDACTED] [REDACTED] | 1.3 |
| 01/22/22 | S Diamant | Research California authority regarding [REDACTED] [REDACTED] | 1.0 |
| 01/24/22 | S Diamant | Draft memorandum summarizing findings on [REDACTED] [REDACTED] | 1.6 |
| 01/25/22 | S Diamant | Draft memorandum summarizing findings on [REDACTED] [REDACTED] | 2.5 |
| 01/25/22 | M Strong | Participate in weekly team call | 0.5 |
| 01/26/22 | R Rubens | Review memorandum written by S. Diamant | 0.2 |
| 01/26/22 | M Strong | Review memorandum prepared by S. Diamant regarding [REDACTED] [REDACTED] | 0.1 |
| 01/31/22 | S Diamant | Analyze settlement offer from City | 0.5 |
| 01/31/22 | M Strong | Analyze city's settlement offer and related correspondence | 0.2 |
| 02/01/22 | S Diamant | Review and comment on draft settlement terms from co-counsel | 0.4 |
| 02/01/22 | M Strong | Analyze the city's settlement offer and related correspondence with S. Diamant | 0.2 |
| 02/07/22 | A Johnson | Telephone conference regarding settlement strategy; analyze settlement correspondence in preparation for same | 1.5 |
| 02/07/22 | R Rubens | Attend settlement discussion | 0.9 |
| 02/07/22 | M Strong | Review draft settlement response and participate in team call regarding same | 1.2 |
| 02/08/22 | S Diamant | Review and comment on settlement correspondence with City | 0.7 |
| 02/08/22 | A Johnson | Revise correspondence; confer with team on settlement strategy | 0.3 |
| 02/08/22 | M Strong | Review and revise settlement letter | 0.2 |
| 02/11/22 | M Strong | Discussion regarding settlement and city's response to our counter-proposal | 0.2 |
| 02/15/22 | A Johnson | Emails with S. Diamant regarding strategy for settlement | 0.3 |

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 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558181
 Page 3

| Date | Timekeeper | Description | Hours |
|----------|------------|--|-------|
| 02/15/22 | M Strong | Review response from the city; participate in weekly team call | 1.0 |
| 02/16/22 | A Johnson | Edit settlement correspondence; emails with team regarding same | 0.3 |
| 02/16/22 | M Strong | Review draft response letter | 0.1 |
| 02/22/22 | S Diamant | Conference with co-counsel regarding status and strategy | 1.2 |
| 02/22/22 | A Johnson | Emails regarding settlement statements and strategy | 0.3 |
| 02/22/22 | K Perigoe | Attend team meeting regarding settlement strategy | 1.0 |
| 02/24/22 | M Strong | Review and revise draft mediation statement; review motion to dismiss decision | 1.4 |
| 02/27/22 | M Strong | Review and revise mediation statement | 0.8 |
| 02/28/22 | M Strong | Correspondence with team regarding conference with defendants and mediation statements | 0.4 |
| 03/01/22 | S Diamant | Review and comment on draft mediation statement; conference with co-counsel regarding status and strategy | 3.0 |
| 03/01/22 | M Strong | Review and revise mediation statement | 0.7 |
| 03/08/22 | S Diamant | Conference with co-counsel regarding status and strategy; draft agenda for same | 1.4 |
| 03/08/22 | A Johnson | Emails regarding settlement statements | 0.5 |
| 03/08/22 | M Strong | Correspondence with team regarding mediation | 0.5 |
| 03/09/22 | S Diamant | Attend settlement conference with Magistrate Judge van Keulen, City and co-counsel; conference with co-counsel regarding same; summarize settlement conference notes, analysis and action items in writing | 4.5 |
| 03/09/22 | M Strong | Correspondence with team about settlement conference | 0.3 |
| 03/15/22 | S Diamant | Conference with co-counsel regarding status and strategy; draft agenda regarding same | 0.7 |
| 03/16/22 | S Diamant | Conference with T. Zito regarding [REDACTED] | 0.5 |
| 03/17/22 | S Diamant | Draft correspondence to City regarding [REDACTED]; review Ninth Circuit case law regarding same | 3.0 |
| 03/18/22 | S Diamant | Draft correspondence to City regarding [REDACTED]; review Ninth Circuit case law regarding same | 2.0 |
| 03/22/22 | S Diamant | Draft and revise settlement correspondence; draft agenda for standing call | 0.7 |

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 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

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 Page 4

| Date | Timekeeper | Description | Hours |
|----------|------------|---|-------|
| 03/25/22 | S Diamant | Draft, revise and finalize letter submission to City's counsel regarding [REDACTED]; confer with D. Kwong (Hewlett Packard Enterprise) regarding comment on same; confer with co-counsel regarding same | 2.3 |
| 03/29/22 | S Diamant | Conference with co-counsel regarding status and strategy; conference with Magistrate Judge van Keulen regarding settlement negotiations; conference with settlement team regarding same | 2.0 |
| 03/30/22 | S Diamant | Attend mediation with Magistrate Judge van Keulen; conference with co-counsel regarding same | 3.6 |
| 03/31/22 | S Diamant | Telephone conference with Magistrate Judge van Keulen regarding settlement issues; confer with co-counsel regarding same | 1.0 |
| 04/01/22 | S Diamant | Draft summary of settlement discussions for case team and D. Kwong | 1.0 |
| 04/05/22 | S Diamant | Conference with co-counsel regarding case status and strategy | 0.9 |
| 04/07/22 | S Diamant | Review and comment on draft statement to court regarding [REDACTED] | 0.3 |
| 04/12/22 | S Diamant | Conference with co-counsel regarding status and strategy | 0.8 |
| 04/12/22 | R Rubens | Discuss ongoing case issues and upcoming settlement conference | 0.7 |
| 04/13/22 | M Strong | Correspondence with S. Diamant regarding settlement negotiations, anticipated settlement offer, and call with mediation judge | 0.4 |
| 04/14/22 | M Strong | Participate in call with settlement judge and circulate summary to team | 0.7 |
| 04/15/22 | M Strong | Review city's settlement proposal; participate in team call to discuss settlement; draft summary of points to cover during call with judge and related follow-up correspondence | 2.5 |
| 04/18/22 | S Diamant | Conference with Magistrate Judge van Keulen regarding mediation; confer with co-counsel regarding same; summarize settlement negotiation status for case team | 2.5 |
| 04/19/22 | S Diamant | Review and comment on draft settlement agreement | 0.8 |
| 04/25/22 | S Diamant | Conference with co-counsel team regarding settlement negotiations | 0.5 |
| 04/26/22 | S Diamant | Conference with team regarding case status and settlement negotiations | 0.4 |
| 05/03/22 | S Diamant | Conference with co-counsel regarding settlement strategy; draft agenda for standing call; confer with team regarding status | 1.7 |
| 05/05/22 | S Diamant | Attend half-day conference With Magistrate Judge regarding mediation; review and comment on summary from ACLU counsel regarding negotiation status; draft correspondence to co- | 3.5 |

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 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558181
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| Date | Timekeeper | Description | Hours |
|----------|------------|--|-------|
| 05/10/22 | S Diamant | counsel regarding result of mediation session Draft agenda for standing call with co-counsel; review and summarize analysis of [REDACTED]; conference with co-counsel group regarding status and strategy | 1.5 |
| 05/13/22 | R Rubens | Attend meeting with co-counsel prior to conference call with City's attorney [REDACTED] | 1.1 |
| 05/20/22 | S Diamant | Review draft settlement agreement from City of Mountain View; conference with co-counsel regarding negotiation strategy in response to City draft settlement agreement | 1.4 |
| 05/23/22 | S Diamant | Conference with co-counsel team regarding settlement status and strategy | 1.1 |
| 05/24/22 | S Diamant | Conference with City's counsel regarding continued negotiation of settlement agreement; conference with co-counsel regarding same | 1.3 |
| 05/31/22 | S Diamant | Conference with co-counsel regarding status and strategy | 1.5 |
| 06/07/22 | S Diamant | Review and comment on draft settlement agreement; conference with co-counsel team regarding status and strategy; draft update to D. Kwong regarding status and strategy | 1.9 |
| 06/21/22 | S Diamant | Confer with co-counsel regarding status and strategy | 0.8 |
| 07/08/22 | S Diamant | Participate in conference with settlement Magistrate Judge regarding next steps in settlement negotiations | 0.5 |
| 07/12/22 | S Diamant | Conference with co-counsel regarding status and strategy; confer with A. Johnson and case team regarding update on same | 1.0 |
| 07/19/22 | S Diamant | Conference with co-counsel team regarding status and strategy; confer with A. Johnson and team regarding same; confer with vendor regarding translation services | 1.4 |
| 07/20/22 | S Diamant | Confer with co-counsel regarding status and strategy; confer with M. Strong regarding status and strategy | 0.5 |
| 07/20/22 | M Strong | Correspondence with S. Diamant regarding settlement negotiations | 0.2 |
| 07/26/22 | M Strong | Participate in call with team regarding settlement and related correspondence with team | 0.9 |
| 08/02/22 | S Diamant | Conference with co-counsel regarding status and strategy | 0.9 |
| 08/08/22 | S Diamant | Review draft settlement agreement; confer with co-counsel regarding same | 0.5 |
| 08/09/22 | S Diamant | Conference with co-counsel regarding settlement negotiations and strategy; confer with team regarding same | 0.7 |
| 08/11/22 | S Diamant | Confer with co-counsel regarding settlement negotiations; review draft agreement regarding same | 1.0 |
| 08/18/22 | S Diamant | Conference with co-counsel regarding status of settlement discussions; confer with K&S and HPE team regarding | 0.9 |

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 420356 Challenge To RV Ban (City Of Mountain Vi
 09/21/22

Invoice No. 10558181
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| Date | Timekeeper | Description | Hours |
|----------|------------|--|------------|
| | | settlement in principle | |
| 08/29/22 | S Diamant | Review and analyze draft settlement agreement; confer with co-counsel regarding same | 0.3 |
| 08/30/22 | S Diamant | Conference with co-counsel regarding status and strategy; draft form of join status report to court; confer with ACLU counsel regarding same | 1.0 |
| 09/06/22 | S Diamant | Conference with co-counsel regarding status and strategy; confer with Q. Ta and team regarding status and strategy; confer with translation service regarding draft settlement agreement | 1.3 |
| 09/08/22 | S Diamant | Confer with team regarding status and strategy; conference with co-counsel regarding settlement strategy | 0.9 |
| 09/09/22 | S Diamant | Confer with co-counsel regarding draft correspondence to City's attorney | 0.3 |
| 09/12/22 | S Diamant | Conference with co-counsel regarding settlement status and strategy | 0.8 |
| 09/13/22 | S Diamant | Conference with co-counsel regarding status and strategy | 0.5 |
| 09/14/22 | S Diamant | Conference with Judge Cousins regarding settlement status; conference with B. Freeman and T. Zito regarding same | 0.7 |
| 09/14/22 | M Strong | Correspondence with team regarding next steps to finalize settlement | 0.4 |
| | | | <hr/> 91.8 |

TIMEKEEPER SUMMARY

| Timekeeper | Hours | Rate | Value |
|---------------|------------|------------|-------------------|
| Arwen Johnson | 3.2 | \$ 1125.00 | \$3,600.00 |
| Kelly Perigoe | 1.0 | 1125.00 | 1125.00 |
| Sam Diamant | 71.8 | 1024.61 | 73,566.99 |
| Rachel Rubens | 2.9 | 639.70 | 1,855.13 |
| Meghan Strong | 12.9 | 775.00 | 9,997.5 |
| Total | <hr/> 91.8 | | <hr/> \$90,144.62 |

Total This Invoice \$90,144.62

KING & SPALDING

FEDERAL I.D. 58-0520153

Remit To:
King & Spalding LLP
P.O. Box 116133
Atlanta, GA 30368-6133

By Wire: Truist Bank (formerly SunTrust Bank)
ABA: 061 000 104
SWIFT: SNTRUS3A
USD Account: 88003 12475
Account Name: King & Spalding

| | |
|--------------|----------|
| Invoice No. | 10558181 |
| Invoice Date | 09/21/22 |
| Client No. | 99994 |
| Matter No. | 420356 |

RE: Challenge To RV Ban (City Of Mountain View)

For questions, contact:
Quyen Ta 1 415 318 1227

REMITTANCE

Please return this page with your remittance.

| | |
|-------------------------|--------------------|
| Amount Due This Invoice | \$90,144.62 |
|-------------------------|--------------------|

Payment is Due Upon Receipt